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Attorneys for Defendants  
BAYER HEALTHCARE PHARMACEUTICALS INC.  
and BAYER HEALTHCARE LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOE V. SANCHEZ and SANDRA L.  
ROARTY-SANCHEZ,,

Plaintiffs,

V.

BAYER HEALTHCARE  
PHARMACEUTICALS, INC.; BAYER  
HEALTHCARE LLC; GENERAL  
ELECTRIC COMPANY; GE  
HEALTHCARE, INC.; TYCO  
INTERNATIONAL, INC.; COVIDIEN,  
INC.; TYCO HEALTHCARE GROUP, LP;  
MALLINCKRODT, INC.; and BRACCO  
DIAGNOSTICS, INC.,

## Defendants.

Case No. CV-08-0973 (EMC)

# **CORPORATE DISCLOSURE STATEMENT OF BAYER HEALTHCARE PHARMACEUTICALS INC. AND BAYER HEALTHCARE LLC**

**(Pending Transfer to: In re: Gadolinium Contrast Dyes Products Liability Litigation, MDL No. 1909, N.D. Ohio)**

[F.R.C.P. 7.1]

Pursuant to Federal Rule of Civil Procedure 7.1(a), Defendants Bayer HealthCare Pharmaceuticals Inc. and Bayer HealthCare LLC make this their Corporate Disclosure Statement. Defendants Bayer HealthCare Pharmaceuticals Inc. and Bayer HealthCare LLC state that they are nongovernmental corporations.

Defendant Bayer HealthCare Pharmaceuticals Inc. is wholly owned by Schering Berlin, Inc. Schering Berlin, Inc. is wholly owned by Defendant Bayer HealthCare LLC. Defendant Bayer HealthCare LLC is wholly owned by Bayer Corporation. Bayer

1 Corporation is wholly owned by Bayer AG. Bayer AG is publicly traded in Germany and  
2 its American Depository shares are listed on the New York Stock Exchange.

3 No other publicly held company owns ten percent (10%) or more of the stock of  
4 Defendants Bayer HealthCare Pharmaceuticals Inc. or Bayer HealthCare LLC.

5 Dated: March 12, 2008

DRINKER BIDDLE & REATH LLP

7 /S/ Rodney M. Hudson  
8 RODNEY M. HUDSON

9 Attorneys for Defendants  
10 BAYER HEALTHCARE  
PHARMACEUTICALS INC. and BAYER  
11 HEALTHCARE LLC

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